

DENNIS STEWART
(State Bar No. 99152)
dstewart@gustafsongluek.com
DANIEL E. GUSTAFSON
(#202241 pro hac)
dgustafson@gustafsongluek.com
JOSHUA J. RISSMAN
(#391500 pro hac)
jrisman@gustafsongluek.com
NOAH L. COZAD
(#402643 pro hac)
ncozad@gustafsongluek.com
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622

CAROLYN H. LUEDTKE
(State Bar No. 207976)
carolyn.luedtke@mto.com
JUSTIN P. RAPHAEL
(State Bar No. 292380)
Justin.Raphael@mto.com
CHRISTOPHER CRUZ
(State Bar No. 346128)
Christopher.Cruz@mto.com
JAVIER KORDI
(State Bar No. 348358)
Javier.Kordi@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street, Twenty-
Seventh Floor
San Francisco, California
94105-2907
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Attorneys for Plaintiffs Joseph
Colon, Shannon Ray, Khala Taylor,
Peter Robinson, Katherine
Sebbane, and Patrick Mehlert

Attorneys for Defendant
National Collegiate Athletic
Association, an Unincorporated
Association.

[additional counsel listed on
signature page]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JOSEPH COLON, SHANNON RAY,
KHALA TAYLOR, PETER ROBINSON,
KATHERINE SEBBANE, AND PATRICK
MEHLERT. individually and on
behalf of all those similarly
situated,

Plaintiffs,

vs.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, an unincorporated
association;

Defendant.

Case No. 1:23-cv-00425-WBS-KJN

Hon. William B. Shubb

*Assigned to Hon. Judge Kendall
J. Newman for Non-Dispositive
Issues*

**JOINT ADMINISTRATIVE MOTION AND
STIPULATION TO EXTEND TIME**

1 WHEREAS, Plaintiffs Joseph Colon, Shannon Ray, Khala Taylor,
2 Peter Robinson, Katherine Sebbane, and Patrick Mehlert
3 ("Plaintiffs") filed an Amended Complaint in this action on May 4,
4 2023;

5 WHEREAS, the Court has related this action to *Smart v.*
6 *National Collegiate Athletic Association*, No. 2:22-cv-02125 WBS
7 KJN;

8 WHEREAS, on May 10, 2023, this Court granted the NCAA's
9 motion in the *Smart* action to continue a hearing on its motions to
10 transfer or dismiss that action so that those motions could "be
11 heard together" with similar motions in this action, *see* No. 2:22-
12 cv-02125, ECF 26;

13 WHEREAS, the Court set the motions in *Smart* for hearing on
14 July 24, 2023;

15 WHEREAS, the parties have conferred and stipulated to the
16 following briefing schedule for motions in response to Plaintiffs'
17 Amended Complaint in this action:

18 1. The NCAA shall file any motions directed to the Amended
19 Complaint by May 23, 2023.

20 2. Plaintiffs shall file any oppositions to such motions by
21 June 23, 2023.

22 3. The NCAA shall file any replies in further support of
23 such motions by July 3, 2023.

24 WHEREAS, pursuant to Local Rule 144(b), the parties'
25 stipulation extends the NCAA's deadline to respond to the Amended
26 Complaint but Court approval is required to extend the other
27 deadlines in the proposed briefing schedule;

28

Pursuant to Local Rules 144(a) and 233, the parties respectfully request that the Court enter the attached proposed order setting the deadlines that the parties have agreed upon for briefing of motions in response to Plaintiffs' Amended Complaint in this action.

Respectfully submitted, MUNGER, TOLLES & OLSON LLP

DATED: May 17, 2023

By: /s/ Carolyn Hoecker Luedtke

CAROLYN HOECKER LUEDTKE

CAROLYN H. LUEDTKE

(State Bar No. 207976)

carolyn.luedtke@mto.com

JUSTIN P. RAPHAEL

(State Bar No. 292380)

Justin.Raphael@mto.com

CHRISTOPHER CRUZ

(State Bar No. 346128)

Christopher.Cruz@mto.com

JAVIER KORDI

(State Bar No. 348358)

Javier.Kordi@mto.com

MUNGER, TOLLES & OLSON LLP

560 Mission Street,

Twenty-Seventh Floor

San Francisco, California

94105-2907

Telephone: (415) 512-4000

Facsimile: (415) 512-4077

*Attorneys for Defendant National
Collegiate Athletic Association*

GUSTAFSON GLUEK PLLC

By: /s/ Dennis Stewart

DENNIS STEWART

DENNIS STEWART

(State Bar No. 99152)

dstewart@gustafsongluek.com

DANIEL E. GUSTAFSON

(#202241 pro hac)

dgustafson@gustafsongluek.com

JOSHUA J. RISSMAN

(#391500 pro hac)

jrisman@gustafsongluek.com

NOAH L. COZAD (#402643 pro hac)

ncozad@gustafsongluek.com

GUSTAFSON GLUEK PLLC

Canadian Pacific Plaza

120 South 6th Street, Suite 2600

Minneapolis, MN 55402

Telephone: (612) 333-8844

Facsimile: (612) 339-6622

Attorneys for Plaintiffs

COLEMAN & HOROWITT, LLP

DARRYL J. HOROWITT

(State Bar No. 100898)

dhorowitt@ch-law.com

COLEMAN & HOROWITT, LLP

499 West Shaw, Suite 116

Fresno, CA 93704

Telephone: (559) 248-4820

Facsimile: (559) 248-4830

Attorneys for Plaintiffs

1 KIRBY McINERNEY LLP

2 ROBERT J. GRALEWSKI, JR.
3 (State Bar No. 196410)
4 bgralewski@kmlp.com
5 MARKO RADISAVLJEVIC,
6 (State Bar No. 306552)
7 mradisavljevic@kmlp.com
8 KIRBY McINERNEY LLP
9 600 B Street, Suite 2110
10 San Diego, California 92101
11 Telephone: (619) 784-1442

12 *Attorneys for Plaintiffs*

13 THE LAW OFFICES OF LEONARD B.
14 SIMON P.C.

15 LEONARD B. SIMON
16 (State Bar No. 58310)
17 lens@rgrdlaw.com
18 THE LAW OFFICES OF LEONARD B.
19 SIMON P.C.
20 655 West Broadway, Suite 1900
21 San Diego, CA 92101
22 Telephone: (619) 818-0644
23 Facsimile: (619) 231-7423

24 *Attorneys for Plaintiffs*

25 FAIRMARK PARTNERS, LLP

26 JAMIE CROOKS
27 (State Bar No. 310447)
28 (pro hac forthcoming)
jamie@fairmarklaw.com
MICHAEL LIEBERMAN,
DC Bar No. 1033827
(pro hac forthcoming)
michael@fairmarklaw.com
FAIRMARK PARTNERS, LLP
1825 7th Street, NW, #821
Washington, DC 20001
Telephone: (619) 507-4182

Attorneys for Plaintiffs